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July 18, 2001

Mr. Steven Hariri
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

RE: Addendum to Work Plan for Soil Closure
Jervis B. Webb of California Site
5030 Firestone Boulevard and 9301 Rayo Avenue
South Gate, CA
SLIC File No. 744
IT Project No. 828208

Dear Mr. Hariri:

This addendum to our Soil Closure Work Plan has been prepared to respond to your verbal request for additional information for the Jervis B. Webb of California (Webb) site in South Gate, CA. Specifically, you requested additional analytical data from the Firestone property (i.e., Title 22 metals data), details from the removal of the clarifier, analytical data from the removal of two tanks from the Rayo property, and a copy of the "No Further Action" (NFA) letter from the Los Angeles County Department of Public Works on the Rayo property. A brief discussion of each of these items is provided below.

Additional Analytical Data - Firestone Property

As part of a Phase II Soil Investigation performed at the Webb site in October 1997 by Erler & Kalinowski, Inc. (EKI February 18, 1998), Title 22 metals, soil pH, total petroleum hydrocarbons, and geotechnical parameters were determined for soil samples collected from 14 soil borings. The metal concentrations detected in the soil were all within normal background levels, including the samples collected from borings near the clarifier (B-1, B-4, and B-6). Arsenic was not detected in any of the soil samples (less than 1 mg/kg). The Title 22 metals data are provided in Table 1, attached.

Soil pH data collected in October 1997 are all within normal background levels (6.3 to 8.8 pH units). Total extractable petroleum hydrocarbon (TEPH) data showed non-detectable levels in all 10 samples analyzed. A summary of the soil pH and TEPH data collected in October 1998 is provided in Table 2. Geotechnical data including moisture content, dry density, total organic carbon, effective permeability, and air conductivity

were also determined for soil samples collected in October 1997. A summary of the geotechnical data is provided in Table 3, attached.

Clarifier Removal - Firestone Property

According to the Work Plan for Clarifier Removal dated April 14, 1999 and approved by the LARWQCB, EKI proposed no additional sampling of soil beneath the clarifier, since sampling of soil surrounding the clarifier had already been performed (Borings B-1 to B-7). The clarifier was removed in June 1999 by Cornerstone Environmental Contractors, Inc. (EKI July 30, 1999). Cornerstone excavated an area measuring approximately 15 feet by 11 feet by 8 feet deep surrounding the clarifier. A total of 47 cubic yards of clean backfill material (sand) was backfilled into the excavation after approval of the sewer pipe capping by an Inspector from the City of South Gate (Rick Rodriguez).

Removal of Two Tanks - Rayo Property

Under the supervision of an Inspector from the Los Angeles Department of Public Works (LACDPW), EKI and Cornerstone Environmental Contractors removed a concrete containment structure (6,500 gallon) and an open-bottom sump (250 gallon) in November 1996 from the Rayo Property. Because both structures were substantially underground, the structures were classified as underground storage tanks (tanks). The concrete tank was used for storage of water and paint, while the purpose of the sump is unknown. The tanks have been reported as out of service since 1987 and 1985, respectively. A permit to remove the tanks was obtained in advance from the LACDPW. A site plan showing the location of the two tanks is shown in Figure 2.

Soil samples were collected two feet below the floor of each tank (referred to as Tank 1 and Tank 2, respectively) immediately following their removal. Samples collected beneath Tank 1 (T-1 and T-2) showed no detectable levels of total recoverable petroleum hydrocarbons by EPA Method 418.1, no detectable TPH as gasoline or diesel, no detectable VOCs by EPA 8260, and no elevated levels of Title 22 metals above their respective Preliminary Remediation Goals (PRG) levels.

The initial soil sample collected beneath Tank 2 (P-1-2) showed elevated levels of total lead (1,600 mg/kg) which exceeded the PRG for lead in industrial soil (1,000 mg/kg) set by U.S. EPA. This sample was collected beneath a dried layer of paint waste at the bottom of the sump. The LACDPW inspector required additional excavation beneath Tank 2 to a depth of 10 feet below ground surface (bgs). Five soil samples were collected from the bottom and four sidewalls of the excavation (samples P-2 thru P-6). Analysis of these five samples showed that no elevated lead levels remained in the native soils. Soil samples collected at 2 feet and 10 feet below Tank 2 showed no detectable levels of VOCs (EPA 8260) and TPH (EPA 8015). Figures 3 and 4 show the sampling locations

beneath the two tanks. Overall, a total of approximately 35 cubic yards of soil was excavated from beneath Tank 2. The soil was transported to a permitted off-site waste disposal facility. A summary of the sampling results from the removal of Tanks 1 and 2 is provided in Tables 4 and 5.

Following review of the Closure Report submitted by EKI (1996), the LACDPW issued a no further action (NFA) letter for the Rayo property on December 17, 1996. A copy of the NFA letter is provided in Appendix A.

Please call me at (949) 660-7511 if there is any additional information you may require.

Sincerely,
IT Corporation

Gary Cronk, P.E.
Sr. Project Manager

Attachments:

Table1. Title 22 Metals in Soil - Firestone Property
Table 2. Soil pH and Total Extractable Petroleum Hydrocarbons
Table 3. Soil Geotechnical Testing Results
Table 4. Analytical Results from Removal of Two Tanks - Rayo Property
Table 5. Title 22 Metals Beneath Two Tanks - Rayo Propoerty
Figure 1. Site Location Map
Figure 2. Location of Underground Structures - Rayo Property
Figure 3. Locations of Soil Samples beneath Tanks 1 and 2 - Rayo Property
Figure 4. Cross Section A-A' Tank 2 Excavation
Appendix A. No Further Action Letter (LACDPW)

cc: Mike Farley, Jervis B. Webb of California
Michael Feeley, Latham & Watkins
Mike Sklash, Dragun Corporation

Table 1. Title 22 Metals in Soil - Firestone Property
Jervis B. Webb of California
South Gate, CA
Samples Collected October 1997 (EKI 1998)

Metal	Boring B-1 @ 5.5 ft	Boring B-1 @ 11 ft	Boring B-4 @6 ft	Boring B-4 @10.5 ft	Boring B-4 @16 ft	Boring B-5 @ 1 ft	Boring B-5 @ 6 ft	Boring B-6 @ 6ft	Boring B-7 @ 2 ft	Boring B-7 @ 6ft	Boring B-8 @2 ft	Boring B-8 @6 ft	Boring B-10 @6 ft	Boring B-11 @ 6 ft	Soil PRG
Antimony	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	<5.0	< 5.0	< 5.0	< 5.0	< 5.0	<5.0	<5.0	< 5.0	<5.0	820
Arsenic	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	440
Barium	64	83	67	57	94	57	56	77	67	60	61	61	33	53	100,000
Beryllium	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	2,200
Cadmium	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	810
Chromium VI	< 0.5	< 0.5	< 0.5	0.88	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	64
Chromium Total	15	42	20	14	30	12	13	74	16	19	21	16	73	13	450
Cobalt	4.5	5.6	5.2	3.7	8.3	3.9	4.0	5.2	4.2	4.0	4.3	4.0	2.3	3.6	100,000
Copper	9	33	15	11	13	5.1	12	120	6.2	18	7.3	8.5	3.4	6.4	76,000
Lead	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	1,000
Mercury	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	610
Molybdenum	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	10,000
Nickel	5.2	8.1	6.3	5.3	14	5.4	5.4	6.2	6.7	5.4	5.0	5.6	3.0	5.3	41,000
Selenium	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	10,000
Silver	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	10,000
Thallium	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	<5.0	< 5.0	< 5.0	< 5.0	< 5.0	<5.0	<5.0	< 5.0	<5.0	160
Vanadium	16	24	20	16	25	15	17	21	19	16	16	17	8.9	16	14,000
Zinc	28	54	35	29	50	29	28	45	33	30	29	28	16	25	100,000

Notes:
mg/kg = milligrams per kilogram
Soil PRG = Preliminary Remediation Goals for Industrial Soil (EPA 2001)
* = California Modified PRG
Analyses by Orange Coast Analytical

File: Table 1- Metals

Table 2. Soil pH and Total Extractable Petroleum Hydrocarbons
Firestone Property - Jervis B. Webb of California
South Gate, CA
Samples Collected October 1997
(EKI 1998)

Boring No.	Depth (feet)	Soil pH (units) EPA Method 9045	Total Extractable Petroleum Hydrocarbons (mg/kg) EPA Method 8015
B-1	5.5	7.9	<0.5
B-2	5.5	NA	<0.5
B-3	6	NA	<0.5
B-4	6	8.3	NA
	10.5	NA	<0.5
B-5	1	7.7	<0.5
	6	8	NA
B-6	6	6.3	NA
B-7	2	7.6	<0.5
	6	6.7	NA
B-8	2	8.6	NA
	6	8.8	<0.5
B-9	5.5	NA	<0.5
B-10	6	NA	<0.5
B-11	6	NA	<0.5

Notes: NA = Not Analyzed
mg/kg = milligrams per kilogram
Analyses performed by Orange Coast Analytical

Table 3. Soil Geotechnical Testing Results - Firestone Property
Jervis B. Webb of California
South Gate, CA
Samples Collected December 1997
(EKI 1998)

Boring No.	Depth (feet)	Moisture Content ASTM D2216 (%)	Dry Density ASTM D2937 (pcf)	Total Carbon Walkley-Black (%)	Effective Permeability API RP40 (millidarcies)	Air Conductivity API RP40 (cm/sec)
B-15	15	22.3	102.1	0.88	NA	No Flow
	31.5	35.8	82.8	0.96	NA	No Flow
	36	10.9	112.8	< 0.01	452.7	3.0E-5
	47.5	24.1	95.9	0.34	NA	No Flow
B-16	16.5	26.6	90.3	0.18	0.7	9.4E-8
	26.5	39.9	85.4	1.07	NA	No Flow
	36	7.0	101.6	0.10	1246.4	8.2E-5
	46.5	25.3	105.8	0.61	0.4	5.2E-7
B-17	16.5	23.4	108.9	0.61	NA	No Flow
	26.5	38.1	89.3	1.11	NA	No Flow
	36.5	26.1	99.4	0.57	0.6	9.2E-8
	46.5	21.5	108.0	0.58	1.1	1.4E-7

Notes: pcf = pounds per cubic foot
cm/sec = centimeters per second
NA = Not Analyzed
Analyses performed by Environmental Geotechnology Laboratory Inc.

Table 4. Analytical Results form Removal of Two Tanks - Rayo Property
Jervis B. Webb of California
South Gate, CA
Samples Collected November 1996
(EKI 1996)

Location	Sample No.	Depth (feet)	TRPH EPA 418.1 (mg/kg)	TPH-Volatiles EPA 8015M (mg/kg)	TPH Extractables EPA 8015M (mg/kg)	Volatile Organic Compounds EPA 8260 (ug/kg)
Tank 1						
	T-1	2	< 5.0	< 0.1	< 10	< 4.0
	T-2	2	< 5.0	< 0.1	<10	< 4.0
Tank 2	P-1	2	NA	0.14	51 (C10-C20) 240 (C20-C30)	< 4.0
	P-2	10	< 5.0	< 0.1	< 10	< 4.0
	P-3	5	NA	NA	NA	NA
	P-4	5	NA	NA	NA	NA
	P-5	5	NA	NA	NA	NA
	P-6	5	NA	NA	NA	NA
Stockpile 1	SP-1		NA	< 0.1	< 10	< 4.0
Dry Paint Scrapings	DS-2		NA	0.11	1,000 (C10-C20) 10,000 (C20-C30)	< 4.0

Notes:
mg/kg = milligrams per kilogram
ug/kg = micrograms per kilogram
NA = Not Analyzed
TRPH = Total Recoverable Petroleum Hydrocarbons
TPH = Total Petroleum Hydrocarbons
Analyses performed by Positive Lab Service

Table 5. Title 22 Metals beneath Two Tanks - Rayo Property
Jervis B. Webb of California
South Gate, CA
Samples Collected October 1996 (EKI 1996)

Metal	T-1 @ 2 ft	T-2 @ 2 ft	P-1 @ 2 ft	P-2 @ 10 ft	P-3 @ 5 ft sidewall	P-4 @ 5 ft sidewall	P-5 @ 5ft sidewall	P-6 @ 5 ft sidewall	SP-1	DS-2	Soil PRG
Antimony	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	<5.0	< 5.0	< 5.0	< 5.0	360	820
Arsenic	2.4	2.2	26	3.1	2.6	2.7	1.6	3.1	2.4	1.7	440
Barium	91	88	100	110	110	110	65	130	96	2700	100,000
Beryllium	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	2,200
Cadmium	<.1	< 1	8.3	< 1	< 1	< 1	< 1	< 1	< 1	2.3	810
Chromium Total	12	11	350	16	14	15	7.4	16	17	7300*	450
Cobalt	8.9	8.1	24	9.8	9.6	9.6	6.3	11	10	150	100,000
Copper	17	12	230	19	17	18	8.5	20	18	850	76,000
Lead	2.8	2.3	1,600*	3.4	2.8	3.2	1.8	4.0	17	31,000*	1,000
Mercury	< 0.1	< 0.1	0.18	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	1.7	610
Molybdenum	< 5	< 5	18	< 5	< 5	< 5	< 5	< 5	< 5	140	10,000
Nickel	9.5	13	72	12	10	13	6.6	15	9.5	18	41,000
Selenium	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	0.64	10,000
Silver	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	10,000
Thallium	1.8	1.2	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	160
Vanadium	31	31	18	39	35	39	21	39	34	7.1	14,000
Zinc	56	50	840	62	57	63	38	70	83	1,200	100,000

Notes:
mg/kg = milligrams per kilogram
Soil PRG = Preliminary Remediation Goals for Industrial Soil (EPA 2001)
* = Value exceeds PRG level
SP-1 = Stockpiled soil from the Excavation
DS-2 = Dry Paint Scrapings
Analyses by Positive Lab Service

File: Table 5- Metals-Rayo